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January 24, 2022

ECF

Honorable Jesse M. Furman
United States District Judge
Thurgood Marshall United States Courthouse
40 Foley Square
New York, New York 10007

Re: U.S. v. Avenatti, 19 Cr. 374 (JMF)
Non-Party Motion to Unseal Docket #s.

Dear Judge Furman:

In connection with my January 18th appointment by U.S.M.J. Sarah L. Cave to represent Justine Loupe, a potential third-party witness in the above-entitled matter, in Mr. Loupe's attempt to quash a defense subpoena to testify, I am writing to request that the Court unseal so much of the relevant docket entries as it may believe I need to fulfill my responsibilities to both it and my client. Tr. 01/18/2022 pp. 9 -13 (referencing, sans date, a Gov't motion to preclude and a January 13, 2022 defense letter).

Unfamiliar with their substance I am not certain that I need be privy to their contents but, to best enable me to represent my client and, by securing my capability to avoid delay and posit a prompt protest, serve the court, see Fed.R.Crim.P. 17(c) (authorizing the Court "on motion made promptly" to "quash or modify a subpoena), I believed, in an abundance of caution, it best to so move.

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Should the Court, by benefit of its superior substantive familiarity with the filings, be of the belief that granting this request is unnecessary, I do not anticipate any need or desire to pursue the matter further.

Thank you.

Respectfully submitted,
s/ Richard Palma
Richard Palma

Application GRANTED in part and DENIED in part. Per the discussion on the record in Court earlier today, the Court understands that the letters relating to the Government's motion to preclude certain cross-examination of Ms. Clifford may be relevant. Accordingly, those letters are unsealed for the limited purpose of providing copies to Mr. Palma (which the Court will do directly). Mr. Palma may use the records *only* in connection with this matter and may not disclose them to anyone, including Mr. Loupe, without further Order of the Court. As the other filings are not relevant to Mr. Loupe, the motion is denied as to them.

SO ORDERED.



January 25, 2022